

United States Courts
Southern District of Texas
FILED

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS HOUSTON DIVISION**

JUN 17 2024

RYAN JOSHUA DIAZ

Nathan Ochsner, Clerk of Court

Plaintiff,

CIVIL ACTION NO. 4:24-cv-00486

v.

**WASTE CONNECTIONS US,
INC.**

JURY TRIAL DEMANDED

Defendant.

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**PLAINTIFF'S RESPONSE TO EXCEPTIONS TO EXHAUSTION OF ADMINISTRATIVE
REMEDIES**

Respectfully submitted,


Ryan Joshua Diaz

Pro Se

27479 Vivace Drive

Spring, Texas 77386

(281) 384-8767 (Telephone)

ryand423@gmail.com

ryand423@outlook.com

**PLAINTIFF'S RESPONSE TO EXCEPTIONS TO EXHAUSTION OF
ADMINISTRATIVE REMEDIES**

1. Futility

Factual Background: The EEOC investigator, Patricia Palacios Ware, explicitly stated that she would not contact my former employer and placed the burden of proof entirely on me. Despite my expressed concerns regarding her apparent bias, she maintained her stance. For instance, she said, "I do not need to contact your former employer." This demonstrates a clear lack of impartiality and engagement, rendering further administrative remedies futile.

Legal Precedent: Courts have recognized futility in similar contexts. In *Miller v. Board of Education*, 459 F.2d 1323 (7th Cir. 1972), and *Shaw v. Delta Air Lines, Inc.*, 463 U.S. 85 (1983), the courts justified bypassing exhaustion due to administrative delays and biased investigations.

2. Irreparable Harm

Specific Impacts: The significant delay of nearly 12 months before receiving a response from the EEOC caused undue stress and financial strain. The stress was so severe that it resulted in anxiety, for which I sought medical attention. Financially, the delay exacerbated my inability to cover living expenses, resulting in accumulating debt.

Supporting Cases: *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008), discusses the principles of irreparable harm. Additionally, *Elrod v. Burns*, 427 U.S. 347 (1976), highlights that the loss of First Amendment freedoms, even for minimal periods, constitutes irreparable injury, which parallels the significant non-financial harms suffered here.

3. Purely Legal Questions

Clarify Legal Issues: The legal questions involved, such as the interpretation of FMLA and ADA provisions, are beyond the administrative agency's expertise. For instance, the specific legal issue of whether my rights under the FMLA were violated when I was terminated during an approved medical leave.

Case Law: *McKart v. United States*, 395 U.S. 185 (1969), recognizes exceptions to exhaustion requirements when purely legal questions are involved.

4. Inadequate Administrative Remedy

Specific Relief Sought: The relief I seek includes compensatory damages for discrimination under the ADA, which the EEOC process didn't provide. This inadequacy in the administrative remedy justifies bypassing exhaustion requirements.

Legal Support: *Perez v. Sturgis Public Schools*, 3 F.4th 236 (6th Cir. 2021), reinforces that exhaustion is not required when the administrative remedy is inadequate.

5. Unreasonable Delay or Official Inaction Argument

Documentation of Delays: A detailed timeline of interactions with the EEOC shows significant delays and lack of action. For example, my initial complaint was filed in 2022, and nearly 12 months passed before I received any substantive response, despite multiple follow-ups.

Case Examples: *Mathews v. Eldridge*, 424 U.S. 319 (1976), discusses unreasonable delays in administrative processes, and *Coit Independence Joint Venture v. FSLIC*, 489 U.S. 561 (1989), recognizes bypass of administrative remedies due to such delays.

FINANCIAL BURDEN OF ARBITRATION

1. Financial Impact of Termination

Detail Hardships: Post-termination, my financial situation deteriorated significantly. I have attached financial statements and documentation illustrating this strain. As the sole provider for my family, the loss of income has resulted in unpaid bills and mounting debt.

Supporting Cases: *Armendariz v. Foundation Health Psychcare Services, Inc.*, 24 Cal.4th 83 (2000), discusses the financial burdens of arbitration.

2. Costs Associated with Arbitration

Breakdown of Costs: Arbitration involves substantial fees, including filing, administrative expenses, and arbitrator compensation. The American Arbitration Association (AAA) fee schedule, for example, includes a \$1,500 initial filing fee, which is burdensome compared to court fees.

AAA Fee Schedule: Specific references to the AAA fee schedule highlight the prohibitive costs, which are a significant financial burden.

3. Comparisons to Court Costs

Court Cost Benefits: In court, fee waivers and reduced costs are available for individuals with financial hardship. For instance, courts often waive filing fees for those who cannot afford them, whereas arbitration agreements rarely provide such relief.

Case Law: *Green Tree Financial Corp.-Alabama v. Randolph*, 531 U.S. 79 (2000), discusses arbitration costs as a barrier to access, emphasizing the disproportionate financial burden on individuals.

4. Legal Precedents and Public Policy Considerations

A. Legal Precedents

Case References: Courts have recognized the financial burden of arbitration on employees. *Armendariz v. Foundation Health Psychcare Services, Inc.*, and *Houston AN USA, LLC v. Walter Shattenkirk*, 03-20-00235-CV, 2020 WL 6877732 (Tex. App. Dec. 30, 2020), are key cases where financial burdens justified not compelling arbitration.

B. Public Policy Considerations

Employee Disadvantages: Studies and statistics demonstrate lower win rates and damages for employees in arbitration compared to litigation. This highlights the inherent disadvantage for employees, supporting the argument against arbitration.

5. Specific Burden in This Case

A. Financial Inability to Bear Costs

Evidence of Financial Hardship: Detailed evidence of my financial situation, such as bank statements and monthly bills, illustrates the inability to afford arbitration costs. The financial strain post-termination has already placed me in a precarious position, which would be exacerbated by arbitration costs. My family is a household of 5. I am the sole financial provider because due to the speech therapy and medical needs of my 3 and 1 year old sons.

B. Potential Attorneys' Fees

Risk Analysis: The arbitration agreement allows Waste Connections US Inc. to seek attorneys' fees if they prevail. This provision acts as a significant deterrent, as the risk of incurring substantial attorneys' fees further discourages pursuing valid claims.

C. Response to Defendant's Motion to Dismiss

1. Failure to State a Claim for Violation of Title VII (Counts I and II)

Plaintiff asserts that the claims under Title VII are adequately pled. Plaintiff's allegations detail specific instances of discriminatory practices, providing sufficient factual content to state a claim that is plausible on its face. In *Ashcroft v. Iqbal*, 556 U.S. 662 (2009), the Supreme Court held that the complaint must contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face. Plaintiff's complaint meets this standard.

2. Preemption of Claims for "Federal Negligence" (Count V) and "Federal Intentional Infliction of Emotional Distress" (Count VI)

The claims for "federal negligence" and "federal intentional infliction of emotional distress" are not preempted. Plaintiff argues that these claims are distinct from the employment discrimination claims under Title VII and the ADA. They address separate and specific conduct that caused harm to the Plaintiff, independent of the discriminatory practices. *Faragher v. City of Boca Raton*, 524 U.S. 775 (1998), supports the argument that claims of emotional distress and negligence can be pursued concurrently with employment discrimination claims.



Ryan Diaz
27479 Vivace Dr
Spring TX 77386-5015

Thanks for saving with Capital One 360®

Here's your **May 2024** bank statement.

STATEMENT PERIOD
May 1 - May 31, 2024

\$6,237.56

TOTAL ENDING BALANCE
IN ALL ACCOUNTS

Account Summary

ACCOUNT NAME	May 1	May 31
360 Checking...0419	\$201.01	\$1,592.50
360 Performance Savings...8236	\$5,381.80	\$4,645.06
All Accounts	\$5,582.81	\$6,237.56

Cashflow Summary

+ \$3.04	INTEREST EARNED THIS PERIOD
- \$0.00	OVERDRAFT AND RETURN ITEM FEES THIS PERIOD
- \$0.00	FINANCE CHARGES THIS PERIOD

360 Checking - 36090570419

JOINT WITH FANYANA DIAZ

0.13%

ANNUAL PERCENTAGE YIELD
(APY) EARNED

\$0.20

YTD INTEREST AND BONUSES

31

DAYS IN STATEMENT
CYCLE



PO Box 77404
Ewing, NJ 08628
STATEMENT ENCLOSED

0-836-CYS60-0006410-001-000-000-000-000

RYAN DIAZ
27479 VIVACE DR
THE WOODLANDS TX 77386-5015

Statement Date: 06/03/24
Account Number: [REDACTED]
Payment Due Date: 07/01/24
Total Amount Due: \$3,189.52

If payment is received after 07/17/24, \$71.44 late fee will be charged.

Contact Us

Customer Service/Pay By Phone: 888-262-0450

Website: cmgmortgage.loanadministration.com

*Qualified Written Requests, notifications of error, or requests for information concerning your loan must be directed to PO Box 77423 Ewing NJ 08628

Account Information

Property Address: 27479 VIVACE DR
SPRING, TX 77386

Outstanding Principal: \$370,288.90
Escrow Balance: \$6,641.81
Maturity Date: May 2052
Interest Rate: 3.75000%
Prepayment Penalty: NONE

Explanation of Amount Due

Loan Set Up on Automatic Payment/ACH * YES
*If your account is set up on Automatic Payment/ACH as indicated above, your account will continue to draft as scheduled.

Principal	\$628.88
Interest	\$1,157.15
Escrow (for Taxes and Insurance)	\$1,403.49
Other	\$0.00
Current Payment Due 07/01/24	\$3,189.52
Total Fees Charged Since Last Statement	\$0.00
Overdue Amount	\$0.00
Total Amount Due	\$3,189.52

Transaction Activity (05/02/2024 to 06/03/2024)

Date	Effective Date	Description	Charges	Payments
05/02/24	05/02/24	MIP/PMI DISB		\$245.84
06/03/24	06/03/24	PAYMT - THANK YOU		\$3,189.52

Past Payments Breakdown *Partial/Unapplied Payments: Any partial/unapplied payments that you make are not applied to your mortgage, but instead are held in a separate account. If you pay the balance of a partial payment, the funds will then be applied to your mortgage.

	Paid Since Last Statement	Paid Year to Date
Principal	\$626.92	\$4,961.00
Interest	\$1,159.11	\$9,327.24
Escrow (Taxes and Insurance)	\$1,403.49	\$18,335.98
Other	\$0.00	\$0.00
Fees	\$0.00	\$0.00
*Unapplied Funds	\$0.00	\$0.00
Total	\$3,189.52	\$32,624.22

Important Messages



NMLS #1820

See Reverse Side For Additional Important Information

Please return this portion with your payment

RYAN DIAZ
THE WOODLANDS TX 77386-5015

Payment Due Date: 07/01/24
Current Payment: \$3,189.52
Past Due Amount: \$0.00
Unpaid Late Charges: \$0.00
Other Fees: \$0.00
TOTAL AMOUNT DUE: \$3,189.52
After 07/17/24 Pay: \$3,260.96

Check this box if your address or personal information has been updated on the reverse of this payment coupon.

Make Checks Payable To:
CMG Mortgage, Inc.

G1

Account Number:

Amount Enclosed

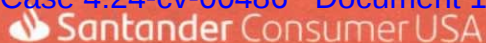
\$

Late Charge	\$
Additional Principal	\$
Additional Escrow	\$
Other Fees	\$
Total Amount paid	\$

*See reverse side for instructions

Please do not fold, tape or staple check or coupon.
Please only use blue or black ink.

PAYMENT PROCESSING CENTER
PO Box 11733
Newark, NJ 07101-4733



RYAN DIAZ
FANYANA PALACIOS
27479 VIVACE DR

SPRING, TX 77386

ACCOUNT INFORMATION

Statement Date 5/27/2024
Account Number [REDACTED]
Account Status as of Statement Date Past Due
Last Payment Made 4/15/2024
Monthly Payment \$1,008.36
Past Due \$1,008.36
Unpaid Fees and Charges \$0.00

TOTAL AMOUNT DUE \$2,016.72
by 5/16/2024

Principal Balance \$43,030.96
Estimated Payoff* \$43,956.83
by 5/27/2024

*Balance includes principal, accrued interest, and unpaid fees and charges as of the statement date

ACCOUNT ALERTS & IMPORTANT INFORMATION

Your account is 10 days delinquent.
No valid work phone number, please update online.

ACCOUNT ACTIVITY SINCE LAST STATEMENT

Date	Description	Total	Principal	Interest	Late Fees	Other Fees

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Questions? Go to MyAccount.SantanderConsumerUSA.com or call 888.222.4227.

FREE PAYMENT OPTIONS

Pay using Auto Pay when you sign up by visiting MyAccount.SantanderConsumerUSA.com or call us at 888.222.4227 to request the Auto Pay authorization form by mail

Pay online using a checking/savings account at MyAccount.SantanderConsumerUSA.com

Pay by phone using a checking/savings account on our automated system at 888.222.4227

Pay by mail: **Santander Consumer USA**
P.O. Box 660633
Dallas, TX 75266-0633

Please include your account number on your check or money order. Allow 5-7 days for delivery. See reverse for alternative payment options.

SPECIAL OFFERS & MESSAGES

PAYMENT COUPON

↑ To receive proper credit, please detach and return with your payment, indicating the amount paid. ↑



RYAN DIAZ
27479 VIVACE DR
SPRING, TX 77386



To update your address and/or telephone information, please check the box and fill out the reverse side.

SANTANDER CONSUMER USA
PO BOX 660633
DALLAS, TX 75266-0633



Total Amount Due **\$2,016.72**
Account Number [REDACTED]
Due Date 5/16/2024



Total Amount Enclosed \$

Paying Your Account Ahead - See reverse side

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SC-SER_40717-0_042420

5 000276905881000 00100836 00201672 0



PO Box 77404
Ewing, NJ 08628
STATEMENT ENCLOSED

0-836-CYS60-0006410-001-000-000-000

RYAN DIAZ
27479 VIVACE DR
THE WOODLANDS TX 77386-5015

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Important Messages



NMLS #1820

See Reverse Side For Additional Important Information

Please return this portion with your payment.

RYAN DIAZ
THE WOODLANDS TX 77386-5015

Payment Due Date: 07/01/24
Current Payment: \$3,189.52
Past Due Amount: \$0.00
Unpaid Late Charges: \$0.00
Other Fees: \$0.00
TOTAL AMOUNT DUE: \$3,189.52
After 07/17/24 Pay: \$3,260.96

☐ Check this box if your address or personal information has been updated on the reverse of this payment coupon.

Make Checks Payable To:
CMG Mortgage, Inc.

G1

Account Number: [REDACTED]

Amount Enclosed \$

Late Charge	\$
Additional Principal	\$
Additional Escrow	\$
Other Fees	\$
Total Amount paid	\$

*See reverse side for instructions

Please do not fold, tape or staple check or coupon.
Please only use blue or black ink.

PAYMENT PROCESSING CENTER
PO Box 11733
Newark, NJ 07101-4733

Future Payment Schedule

for 15-TX6751996 - RYAN DIAZ

Invoice Date	Due Before	Amount
07/12/2024	08/01/2024	\$490.00
08/12/2024	09/01/2024	\$490.00
09/11/2024	10/01/2024	\$490.00
10/12/2024	11/01/2024	\$490.00
11/11/2024	12/01/2024	\$490.00
12/12/2024	01/01/2025	\$490.00

Alt+A



Ryan Diaz <ryand423@gmail.com>

re: EEOC Charge No. 460-2022-07317 filed against WASTE CONNECTIONS

2 messages

PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@eeoc.gov>
To: "Ryand423@gmail.com" <Ryand423@gmail.com>

Thu, Sep 7, 2023 at 3:07 PM

Good afternoon, Mr. Diaz:

Our attempt to reach you via telephone was unsuccessful. We received a message that your mailbox is full.

We would like to discuss the status of your charge with you.

Are you available tomorrow morning at 10:30 a.m.?

Respectfully,

Patricia Palacios Ware

Federal Investigator – EEOC, Houston District Office

Direct: (346) 327-7681

Fax: (713) 651-4902

**U.S. Equal Employment Opportunity Commission****HOUSTON DISTRICT OFFICE**1919 SMITH STREET, 7TH FLOOR

HOUSTON, TEXAS 77002-8049

WWW.EEOC.GOV

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Ryan Diaz <ryand423@gmail.com>

To: PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@eeoc.gov>

Thu, Sep 7, 2023 at 4:00 PM

Hello Ms. Palacios,

I greatly apologize for missing your call. I just returned it and left a voicemail.

Yes ma'am I will be available tomorrow at 10:30AM.

[Quoted text hidden]

6/7/24, 8:48 AM

Gmail - re: EEOC Charge No. 460-2022-07317 filed against WASTE CONNECTIONS



Ryan Diaz <ryand423@gmail.com>

re: EEOC Charge No. 460-2022-07317 filed against WASTE CONNECTIONS

3 messages

PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@eeoc.gov>

Fri, Sep 8, 2023 at 1:45 PM

To: Ryan Diaz <Ryand423@gmail.com>

Dear Mr. Diaz:

This is a follow-up to the conference call this morning. The purpose of the call was to inform you that the charge will be submitted for final review to determine if further investigation is warranted. The evidence revealed you were discharged from your employment after requesting a letter of recommendation for an external employment opportunity. This is a non-discriminatory reason.

Although you claim you were discriminated against based on a disability, the evidence is insufficient to support a violation of the laws enforced by this agency. You were granted a medical leave of absence and Respondent expected you to return to work. Respondent made the decision to discharge you from your employment after receiving an e-mail request for a letter of recommendation. There is insufficient evidence showing proof you were subjected to discrimination based on your disability.

You informed the investigator that you believed you could not provide additional evidence because you did not want to violate privacy laws (non-disclosure). You are required to submit any and all information you believe is relevant to your claim. You may share the information with persons in a privileged relationship, such as a spouse, clergy, or medical, financial or legal advisor.

The deadline to submit additional information is on or before **Thursday, September 14, 2023**. The charge will be submitted for final review after the above date. As explained during our conference call, EEOC investigators are neutral fact finders. We gather evidence to determine if there is sufficient evidence to issue a violation.

We fully understand that the parties to a charge often have very firm views that the available evidence supports their respective positions. Our final determinations must comport with our interpretation of the available evidence and use of our resources.

If the Determination and Right to Sue is uploaded to the portal, it will explain your right to pursue the matter in court. If you wish to pursue the charge, a lawsuit must be filed in Federal District Court within 90 days of receipt of the Notice. *If a lawsuit is not filed within the required 90-day period, the right to file a lawsuit in this matter will expire and cannot be restored by the EEOC.*

Respectfully,

Patricia Palacios Ware

Federal Investigator – EEOC, Houston District Office

Direct: (346) 327-7681

Fax: (713) 651-4902



U.S. Equal Employment Opportunity Commission
HOUSTON DISTRICT OFFICE
1919 SMITH STREET, 7TH FLOOR
HOUSTON, TEXAS 77002-8049
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Ryan Diaz <ryand423@gmail.com>
To: PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@eeoc.gov>

Fri, Sep 8, 2023 at 6:37 PM

Dear Ms. Palacios Ware

I greatly appreciate your time.

I was able to get in contact with TWC and they have processed a request to send me the documents you and I discussed over the phone. TWC was able to produce evidence that Waste Connections initially stated that I voluntarily quit and was not fired in addition to notes, letters sent by the agent and time stamps. This will further support my claim that I've expressed that waste connections is lying and their justification is pretext.

Since the TWC request for information was made late afternoon on a Friday, I was informed it may not be seen until Monday.

I will posting the additional evidence once I receive it.

Is it possible to get a further extension past Thursday the 14th since how fast they will process my Information request is beyond our control?

The additional circumstantial evidence that I do have readily available, I will be uploading this evening.

Thank you for clearing up my concerns with the non disclosure agreement. I now understand that the evidence I present here is still able to be used in federal court since mediation was declined by the employer.

[Quoted text hidden]

PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@eeoc.gov>
To: Ryan Diaz <ryand423@gmail.com>

Mon, Sep 11, 2023 at 8:30 AM

Mr. Diaz:

We will grant the extension. Please upload additional information on or before Monday, September 18, 2023.

Respectfully,

Patricia Palacios Ware

Federal Investigator – EEOC, Houston District Office

Direct: (346) 327-7681

Fax: (713) 651-4902



U.S. Equal Employment Opportunity Commission
HOUSTON DISTRICT OFFICE
1919 SMITH STREET, 7TH FLOOR
HOUSTON, TEXAS 77002-8049
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From: Ryan Diaz <ryand423@gmail.com>
Sent: Friday, September 8, 2023 6:38 PM
To: PATRICIA PALACIOS WARE <PATRICIA.PALACIOSWARE@EEOC.GOV>
Subject: Re: EEOC Charge No. 460-2022-07317 filed against WASTE CONNECTIONS

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.

[Quoted text hidden]